

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

POWER INVESTMENTS, LLC,)
)
Plaintiff/Counterclaim Defendant,)
)
v.) **Case No. 4:21-cv-01022-SEP**
)
CARDINALS PREFERRED, LLC,)
)
Defendant/Counterclaim Plaintiff.)

**PLAINTIFF POWER INVESTMENTS, LLC'S
MOTION TO FILE UNDER SEAL**

COMES NOW Plaintiff Power Investments, LLC ("Power"), by and through undersigned counsel, and moves this Court for leave to file under seal indefinitely its Reply in Support of its Motion to Exclude Defendant's Expert Gary Goolsby ("Reply").

In support of its Motion, Power states the following:

1. Power's Reply quotes, cites and describes the confidential contents of exhibits previously filed under seal.
2. Power requests the indefinite sealing of the Reply because it contains highly sensitive information relating to Ashley and to Power (a member of Ashley).
3. The Stipulated Protective Order requires Power to seek leave of Court to file the Reply under seal. (ECF 43 ¶ 13) Given the sensitive nature of the information contained in the Reply, good cause exists to permit Power to file the Reply under seal indefinitely.
4. Accordingly, and pursuant to Local Rule 13.05, the Court's Protective Order, and the additional reasons set forth in the memorandum filed concurrently with this motion, Power

requests leave to file the Reply under seal indefinitely.

WHEREFORE, Power respectfully requests that this Court enter an Order granting Power leave to file under seal indefinitely its Reply in Support of its Motion to Exclude Defendant's Expert Gary Goolsby, and such other and further relief as the Court deems just and proper under the circumstances.

Dated: August 15, 2022

Respectfully submitted,

DOWD BENNETT LLP

/s/ James F. Bennett

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CERTIFICATE OF SERVICE

The undersigned certifies that on this August 15, 2022, the foregoing and all attachments were electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the same to all counsel of record.

/s/ James F. Bennett